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September 1, 2020

**VIA ECF**

Honorable Michael B. Kaplan, U.S.B.J.  
U.S. Bankruptcy Court  
402 East State Street  
Trenton, New Jersey 08608

**Re: Debtor: Hollister Construction Services, LLC  
Ch. 7; Case No. 19-27439-MBK**

Dear Judge Kaplan:

Kindly accept this Letter Brief in reply to the Motion filed by the Debtor seeking an Order to determine certain construction liens are invalid.

My client thanks the Debtor for filing the Motion, however, since the filers of the Mechanic Liens, (Priority Electric, Sunbet Rental and Swift Electrical) were not parties to the Settlement Agreement (Document No. 1052-1), I anticipate the non-parties to the Settlement Agreement will proceed to sue Lifetown in State Court for the amounts set forth in the Construction Liens based on a *quantum merit* theory as did 360 Fire Protection LLC once the liens are discharged.

Accordingly, it is respectfully requested of the Court as part of this Motion, have the Debtor include these parties as parties to the Settlement and have the Subcontractors agree to release Lifetown from all claims as the other subcontractors did in paragraph 12 (c) of the Settlement Agreement.

Thank you for your assistance in this matter.

Respectfully submitted,  
**STANZIALE & STANZIALE, P.C.**

/s/ Benjamin A. Stanziale, Jr.  
Benjamin A. Stanziale, Jr.

BAS,Jr/bas,III

Cc: Kenneth A. Rosen, Esq. (via ECF)